

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Andres Reyes Case No. 22-10299 Chapter 13

All Cases: Moving Creditor LAKEVIEW LOAN SERVICING, LLC Date Case Filed 9/9/2022

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 04/14/2023

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
 - a. ☒ Home
 - b. ☐ Car Year, Make, and Model _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of 05/23/2023 \$273,726.25
 Total of all other Liens against Collateral _____
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$345,000.00, per Debtor's Schedules
5. Default
 - a. ☒ Pre-Petition Default as of petition date
 Number of months 1 Amount \$2,567.88
 - b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
 Number of months 4 Amount \$10,469.27
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
 Number of months _____ Amount _____
6. Other Allegations
 - a. ☐ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: June 5, 2023
 (Rev. 12/21/09)

/s/ Joel P. Fonferko
 Counsel for Movant